

United States District Court
For The District of Rhode Island

Richard Paiva

2019 APR 22 P 12:24

v.

C.A.-No. 17-014-JJM

R.I. Dept. of Corrections

Motion For The Appointment
of Counsel

Plaintiff, Richard Paiva, respectfully moves this Honorable Court to appoint Counsel to represent him, and the inmate class at the A.C.I., in this matter for the following reasons:

1. Plaintiff is indigent and unable to afford counsel.
2. The issues involved in this matter are complex.
3. The plaintiff does not have physical access to an "adequate" library to take on the task of effectively researching up-to-date case law, and to research disciplinary

policies from other state Dept. of Corrections, as will be required to defend against any modification of the "Morris Rules".

4. The issue at hand is a class-action, and any outcome will affect every inmate at the A.C.I. when subjected to discipline.
5. The plaintiff has limited knowledge of the law, and has no legal training.
6. Plaintiff is incarcerated in solitary confinement.

WHEREFORE, plaintiff respectfully moves this Honorable Court to appoint counsel to represent him.

Respectfully submitted,

Richard Paiva
Richard Paiva, pro se
ACI-High Security
P.O. Box 8200
Cranston, RI
02920

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Certification

I hereby certify that I sent a true copy of the enclosed, on this 18th day of April, 2019, to the following:

Michael Grant, Esq.
40 Howard Avenue
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Richard Paiva
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